

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

|                            |   |                     |
|----------------------------|---|---------------------|
| JOAO TAVARES,              | ) |                     |
|                            | ) | Civil Action No.    |
| Plaintiff,                 | ) |                     |
|                            | ) | 1:14-cv-01709-ODE   |
| v.                         | ) |                     |
|                            | ) | JURY TRIAL DEMANDED |
| KENNESAW PEDIATRICS, P.C., | ) |                     |
|                            | ) |                     |
| Defendant.                 | ) |                     |
|                            | ) |                     |

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**JOINT MOTION TO STAY PROCEEDINGS AND DEADLINES**

The parties herein, Plaintiff Joao Tavares and Defendant Kennesaw Pediatrics, P.C. (collectively the “Parties”), by and through their counsel and pursuant to LR 7.1, NDGa., respectfully move the Court to stay all proceedings and deadlines in this action, including the time for filing responsive pleadings to any docketed filings, on grounds that the Parties have reached a proposed settlement. The Parties are preparing settlement documentation and will submit a motion for settlement approval on or before August 20, 2014.

**WHEREFORE**, the parties respectfully request that the Court consider this motion and enter an Order staying proceedings and all deadlines in this action.

Respectfully submitted, this 6<sup>th</sup> day of August, 2014.

/s/ V. Severin Roberts  
V. Severin Roberts

/s/ Carl Sollee\*  
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\*With express permission by VSR

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **Joint Motion to Stay Proceedings and Deadlines** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

This 6<sup>th</sup> day of August, 2014.

By: s/V. Severin Roberts  
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Georgia Bar No. 940504

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